

**UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF PUERTO RICO**

UNITED STATES OF AMERICA,

Plaintiff;

v.

COMMONWEALTH OF PUERTO RICO,
ET AL.,

Defendants.

No. 12-cv-2039 (GAG)

**MOTION TO RESTRICT UNITED STATES' RESPONSE TO
PRPB'S MEMORANDUM IN COMPLIANCE WITH ORDER AT DOCKET 1825**

COMES NOW, Plaintiff, the United States of America, by and through the undersigned counsel, and respectfully moves to restrict its Response to PRPB's Memorandum in Compliance with Order at Docket 1825 (Response), ECF No. 1837, for viewing by the Court, the Monitor, the Special Master, and counsel for the Parties, in accordance with Standing Order No. 9, *Amendment to the Restricted Filing and Viewing Levels Module*, Misc. No. 03-149 (Jan. 30, 2013). For cause, the United States alleges and states:

1. On August 31, 2021, the Commonwealth filed its PRPB Memorandum in Compliance with Order at Docket 1825 (PRPB Memorandum) in restricted mode. ECF No. 1830. Simultaneously, the Commonwealth filed a motion to restrict the PRPB Memorandum. ECF No. 1831. The Court granted the motion to restrict noting that the PRPB Memorandum "will be unrestricted at a later date on or before the status and public hearing of September 9, 2021." Order, ECF No. 1833 (Sep. 1, 2021).
2. The United States seeks to restrict its Response to the PRPB Memorandum because it pertains to matters that are restricted presently. The United States requests that the

Court lift the restriction on the United States' Response when it lifts the restriction on the PRPB Memorandum or until such time as the Court deems appropriate.

WHEREFORE, the United States respectfully requests that the Court grant the Motion to Restrict United States' Response to PRPB's Memorandum in Compliance with Order at Docket 1825, ECF No. 1837.

WE HEREBY CERTIFY that on today's date, we filed the foregoing pleading electronically through the CM/ECF system, which caused the parties, counsel of record, the Special Master, and the Monitor on the service list to be served by electronic means.

Respectfully submitted, this 7th day of September, 2021,

STEVEN H. ROSENBAUM
Chief, Special Litigation Section
Civil Rights Division

s/ Luis E. Saucedo

TIMOTHY D. MYGATT
Deputy Chief
LUIS E. SAUCEDO (G01613)
JORGE CASTILLO (G02912)
Trial Attorneys
U.S. Department of Justice
Civil Rights Division
Special Litigation Section
950 Pennsylvania Avenue, NW
Washington, DC 20530
Telephone: (202) 598-0482
Fax: (202) 514-4883
luis.e.saucedo@usdoj.gov
jorge.castillo@usdoj.gov

Attorneys for Plaintiff